



1803 BUILDING  
April 12, 2001

The Dow Chemical Company  
Midland, Michigan 48674

Stephanie Black  
Headwaters Incorporated  
11778 South Election Drive  
Ste. 210  
Salt Lake City, UT 84020  
Fax: 801-984-9410

Dear Stephanie Black:

The following information should answer your questions concerning our product(s).

COVOL 298-1 (128323)  
Conference of Northeastern Governors (CONEG)---  
Composition and Trace Analysis Information

For information on the components of our product(s) and their concentration, please refer to the Material Safety Data Sheet (MSDS) and the Sales Specification. Any hazardous constituent above 1% (by weight) and any special hazardous substance (including listed carcinogens) above 0.1% will appear in the ingredients section of the MSDS for this product. In addition, consult the Hazardous Decomposition Products section of the MSDS and the Sales Specification for further information.

Dow does not routinely analyze for additional materials that are not listed in the MSDS or Sales Specification. The additional material(s) identified in your inquiry are not intentionally added to this product. Furthermore, Dow has received certificates of compliance with CONEG legislation from our major U.S. packaging materials suppliers.

COVOL 298-1 (128323)  
Hazardous Air Pollutants (HAPs)

This product is a proprietary blend as described in the Material Safety Data Sheet (MSDS). I am not aware of this product containing any HAPs above 0.1%.

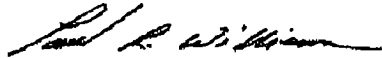
The following Environmental Protection Agency (EPA) web site is also available for your reference of the most current HAPs listings, including recent modifications to the listings: <http://www.epa.gov/ttn/uatw/orig189.html>.

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Please submit future environmental and Food and Drug Administration (FDA) inquiries in writing to our fax number: 517-638-9933. Your inquiry must contain the complete Dow Chemical product name(s) and specific request for information on regulation(s) or issue(s). Please also include your Company name, complete mailing address, phone and fax numbers. For all other information, call your Dow Representative or distributor. Thank you for your interest in Dow products.

Sincerely,



Paul R. Williams  
EH&S Product Regulatory Management

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